

EXHIBIT C

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

BEGASHAW AYELE, PRO SE)	
)	
Plaintiff)	
Vs.)	CIV. ACTION NO. 04-12217PBS
)	
COGNSIA SECURITY CO. INC,)	
)	
Defendant)	

**PLAINTIFF'S ANSWER TO DEFENDANT'S
FIRST SET OF INTERROGATORIES**

Plaintiff for the above referenced captioned-case answer Defendant's Interrogatories per Federal Rule of Civil Procedure 33 as follows.

INTERROGATORIES AND ANSWERS

INTERROGATORY NO.1

Identify all persons you have interviewed and/or obtained any statement from concerning the facts or claims contained in your complaint or Amended Complaint and state whether the statement were written or oral

ANSWER

Objection, plaintiff object to such interrogatory on the ground that the interrogatory seek

privileged document protected under the work product rule of the federal rule of civil procedure

INTERROGATORY NO.2

Identify all persons you believe have knowledge of any of the facts or claims contained in your Complaint, Amended Complaint, or the charge of discrimination you filed with the Equal Employment Opportunity Commission ("EEOC") or the Massachusetts Commission Against Discrimination("MCAD").

ANSWER

(1) Nicole Downes, Cognisa Human Resource Manager (2) Aaron Feo, Manager, Field Human Resources for Cognisa Security Co. Inc, (3) Dr. Aweke Alemayehu, (4) Jennifer Rego, Human Resource Administrator, as well as people interviewed by plaintiff as indicated in answer No. 2, above

INTERROGATORY NO.3

Identify any current or former employee of Defendant with whom you have discussed your claims or the conduct you alleg give rise to your claims.

ANSWER

Objection, as the interrogatory is repetitive and calls the plaintiff's answer as provided in the proceeding paragraph.

INTERROGATORY NO.4

For each person identified in response to Interrogatory No.2 above, state the basic facts or

claims of which that person has knowledge.

ANSWER

Objection, as plaintiff can not rephrase other peoples' word, interpret their understanding of fact or version, and therefore, I maintain a position to hold such information until they themselves testify or submits their understanding of facts in court.

INTERROGATORY NO.5

Identify all documents you plan to use in support of your claims at trial or which you contend support your claims at this time.

ANSWER

All the parties' file copy of documentation found in the EEOC/MCAD office, deposition transcripts whether by tape recorder or paper printouts and privileged documents, among other things

INTERROGATORY NO. 6

Identify with specificity and particularity each and every element and item of damages (including monetary amount) that you contend that you are entitled to recover from Defendant in this action.

ANSWER

Refer to a separately submitted paper to counsel, not filed with the court.

INTERROGATORY NO.7

Explain in detail how each damages item identified in response to Interrogatory No. 6 was calculated, and further identify: (a) each and every document supporting each damages item; and (b) each and every person whom you contend has knowledge of each damages item.

ANSWER

Refer to the answer given at Paragraph/Interrogatory No. 6

INTERROGATORY NO.8

Identify all reports of each expert witness you intend to call to testify on your behalf concerning your claims or damages

ANSWER

Plaintiff will submit all complied documents, mostly medical bills from hospitals once I get the complete file, the doctors name, address and other information related to such expert witness

INTERROGATORY NO. 9

State all income or other monies you have received since January 2003, from whatever sources including unemployment compensation, and identify the sources of such income or monies.

ANSWER

Plaintiff has no such documentation. However, I am in contact with the State Unemployment benefic office to retrieve any of the dead file concerning such claim. I will, if Found, to forward to defense counsel as soon as I got such documents.

INTERROGATORY NO.10

Identify any other employers with whom you applied for employment since January 1, 2003, including the date of application, the individual(s) contacted, and any document evidencing such application, the result of your application, (e.g., if you were offered a job if the employer is still holding your application, if you were denied the position you applied for, if you received no response, .. etc) and the reason given to you for the result of your application.

ANSWER

Objection, Plaintiff object such interrogatories on the ground that such cumulative and several application forms submitted to the employer by hand, mail. Internet or filed by others on behalf of the plaintiff as a source of referral constitute undue hardship (or is very difficult) to gather in a simple file and, therefore, cannot be produce such documents as part of defendant's request for production of documents or interrogatories.

INTERROGATORY NO. 11

List all employers with whom you have been employed since January 1, 2003, including

their address, telephone numbers, your immediate supervisor's name the date of employment and the reason for leaving each employer

ANSWER

- Barton Protective Services, 800 Boylston St #1450, Boston, MA 02199 (617) 859-3700
- SSI Security System Inc. 110 Florence St. Malden, MA 02148, (781) 388-3200
- Allied Security CO. Inc. 1135 Tremont St. Boston, MA 02218 (617) 859-8448).

The reason for leaving all these companies (now all merged) was because when I had legal problem with the first, others had terminated me for retaliatory/conspiratory/discriminatory reason but all have been sued and except one which the case is pending in court the other paid the price.

INTERROGATORY NO.12

If you claim damages for emotional distress or suffering please identify any physician, psychiatrist, therapist or counselor that you have consulted with or been treated by within the last ten (10) years.

ANSWER

Plaintiff had no such claim except humiliation and economic damage as a result of deprivation of employment opportunity.

INTERROGATORY NO.13

Identify any and all medical doctors, physical therapists, nurses, psychologists,

psychiatrists, counselors, advisors and/or other medical or psychological professionals whom you have seen for all injuries you have allegedly suffered as a result of the alleged discrimination and/or retaliation in this case..

ANSWER

Plaintiff's answer is similar, if not identical, to the answer given for interrogatory No. 8

INTERROGATORY NO. 14.

Identify any individuals consulted in connection with the preparation of the answer to those interrogatories.

ANSWER

Nobody, but the plaintiff himself.

INTERROGATORY NO. 15.

If you are represented by counsel, identify in detail your fee arrangement with your attorney(s) in this lawsuit (i.e., hourly, contingent fee, a combination of hourly and contingency, or some other basis). If your arrangement is on an hourly basis (in whole or in part) please identify the amount of retainer that you have paid, the hourly fees of each and every lawyer and or/paralegal working on the case, the amount of all legal fees, costs, and/or expenses through completion of trial. If your fee arrangement is on a contingency fee basis, please detail the specific arrangements (including all percentage of recovery fee arrangement).

ANSWER

No representation and no fee arrangement was made as Plaintiff proceed as a pro se litigant to this point. As the case progress, however, I will make such arrangements, however..

INTERROGATORY NO.16

Identify all legal proceeding to which you have been within the last ten (10) years, including but not limited to, any civil action, criminal action divorce proceedings, bankruptcy proceeding, child custody proceedings or any administrative proceeding of any type. Please identify each matter by providing the name of all parties to the action, the court or administrative forum which the matter is or was pending, the applicable case number, the date of such filing, the nature of the allegations underlying such filing, and the disposition of such filing.

ANSWER

- 1-96CV-10267NG, Ayele vs. Standard Parking Co. Filed 02-12-96 - settled
- 1-96CV-12201REK, Ayele vs. Allright parking. Filed 11-01-96- dismissed.
- 1-01CV-12175MLW, Ayele vs. Boston Univ. Filed 12-11-01 survived S/J and is pending
- 1-03CV-11249NG, Ayele vs. Barton Sec. Co. Inc. Filed 06-12-03, Settled
- 1-04-CV-12216RCL , Ayele vs. Allied Security LLC, Filed 10-18-04, Pending
- **Cognisa (pending)** and, other small claims related to traffic, ..etc but *never* criminal nature..

INTERROGATORY NO. 17.

Have you applied for workers' compensation benefit, social security benefit, unemployment benefits, pension or retirement benefit, benefits from a profit sharing plan, health care benefits, disability benefits, benefits stemming from an insurance policy, or any other benefit from any local, state or federal agency or any other source?. If so, please describe the

specific information and details provided by you in those applications, and identify any and all documents within your possession, custody, or control which evidence those applications for benefits, including, but not limited to, any application forms or supporting documentation.

ANSWER #17

Objection, request is multiple, vague, duplicative or repetitive which has been answer in part or in whole in the proceeding paragraph.

INTERROGATORY NO.18.

State the basis of your claim that you were discriminated against on the basis of your race, color, national origin and allegedly disability.

ANSWER

Objective, as the answer to such interrogatory is found on the plaintiff's Complaint, Amended Complaint, the EEOC/MCAD file.


INTERROGATORY NO.19

Identify all legal proceedings to which you have been a party within the last ten (10) years, including, but not limited to, any civil action, criminal actions, divorce proceedings, bankruptcy proceedings, child custody proceeding or any other administrative proceeding of any type. For each such proceeding, identify the court case number and parties' names, and describe the claims brought relief sought and the resolution and/or status of the case.

ANSWER

Objective, the Interrogatory is vague, repetitive and/or duplicate and the answer to such interrogatory has been given at the proceeding paragraph at No.16, above.

Respectfully submitted,


Begashaw Ayele
261 O'Callaghan Way #816
South Boston, MA 02127
(617) 474-9774

Date 3/8/05

CERTIFICATE OF SERVICES

This certify that the foregoing document titled "Plaintiff's Answer to Defendant' s
First Set of Interrogatories" has been served on the defense counsel by hand delivery at DUANE
MORRIS LLP, 470 Atlantic Avenue, suite 500, Boston, Massachusetts 02210.

Date

3/8/05

Sincerely,


Begashaw Ayele